

The response to EPA's Primary Comments 2 and 3 and To Be Considered Comment 2 on the Draft Bathymetry Survey Field Sampling Plan (FSP) will be after the desired approval of the FSP. Accordingly, the FSP will be conditionally approved pending the following conditions.

- Submittal of a survey monument map that is acceptable to EPA
- Submittal of a revised PDI Programmatic Health and Safety Plan (Programmatic HASP) and a bathymetric survey-specific addendum health and safety plan task hazard analysis that addresses all of EPA's comments on the Programmatic HASP. Per Section 5.7a of the Pre-Remedial Design Investigation and Baseline Sampling Statement of Work, the bathymetry work may not commence until EPA comments on the Programmatic HASP have been resolved. General health and safety requirements for over-water work at Portland Harbor include:
  - Hazwoper 40-hour certification and current 8-hour refresher training for all staff
  - Medical surveillance for all staff
  - Onboard first aid kit, fully charged artificial external defibrillator (AED), eyewash station
  - Fire extinguisher, fully charged and maintained
  - US Coast Guard (USCG) approved person flotation devices (PFDs) for all staff
  - Personal protective equipment, including hard hats in areas of overhead hazards, appropriate protective footwear (chemical resistant rubber boots or overboots in areas of contamination and boots with toe protection in areas of potential crushing hazards), chemical resistant gloves, and safety glasses.
  - Identification of site work zones including the exclusion zone, contamination reduction zone, and support zone for each site work area
  - Chemical hazard assessment based Portland Harbor – specific contaminant data and selection of appropriate air monitoring and contingency procedures
  - Spill containment program, including reporting procedures to EPA, Oregon Emergency Response System (OERS), National Response Center (NRC), and U.S. Coast Guard
- Submittal and EPA approval of a second work plan, as needed, to address comment details for the LIDAR contingency. A condition of approval will be established for delivery of this second work plan as necessary.